

## REMARKS/ARGUMENTS

Applicant responds herein to the Notice dated September 5, 2006.

The Notice contends that the applicant failed to properly address the 35 U.S.C. §112 issue of the first Office Action “on the merits”. This Communication addresses that issue.

In the last paragraph of claim 14 submitted with the last Communication, the trunk gateway is defined to have the functions of calling both a caller and a callee to open call channels therethrough and connecting the open call channels for their phone conversations. Since the trunk “gateway” has these functions noted above, it can be said that the trunk gateway takes the role of a “call connecting means” for several kinds of communication devices, such as those involving conventional wire telephones, mobile telephones, personal computers operating over different networks, such as the Internet, a PSTN and a mobile telecommunication network.

Details of these functions are found in the instant specification; see, for example, page 16, line 15 to page 18, line 9. Given the foregoing, the applicant respectfully traverses the indication in the Office Action that the term “trunk gateway” was not properly defined in the specification. In fact, it has a meaning at least as broad as to cover the aforementioned functionality.

The trunk gateway, which has the functions defined in claim 14, can be regarded as a type of a VoIP trunk gateway. For the Examiner’s reference, applicant has copied below the definition of VoIP trunk gateway from the *Whatis.com* web page as follows:

*“A VoIP trunk gateway is an interface that facilitates the use of plain old telephone service (POTS) equipment, such as conventional phone sets and fax machines, with a voice over IP (VoIP) network.”*

*Commercially manufactured VoIP trunk gateways take the form of self-contained units (boxes) or circuit cards. The number of ports for POTS devices varies, depending on the intended application (small business, medium-sized business, or enterprise). The VoIP trunk gateway connects subscribers to the VoIP network without involving operators or incurring telephone company toll charges. The VoIP service provider establishes its own schedule of rates, if applicable, for local and long-distance calling.”*

In contrast, a “router” is defined in the *TechEncyclopedia* as follows:

*“Router is a network device that forwards packets from one network to another. Based on internal routing tables, routers read each incoming packet and device*

*how to forward it. To which interface on the router outgoing packets are sent may be determined by any combination of source and destination address as well as current traffic conditions (load, line costs, bad lines, etc.)."*

From the above-noted references, it can be easily understood that the definitions of "trunk gateway" and "router" are not equivalent to one another. Accordingly, it is not acceptable, and the applicant specifically traverses the Examiner's indication that the term "trunk gateway" should be assumed in this application to have definition and meaning which is equivalent to the function and definition of a "router".

Favorable consideration of the application, in light of the foregoing remarks, is earnestly solicited.

Respectfully submitted,

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MAX MOSKOWITZ  
Registration No.: 30,576  
OSTROLENK, FABER, GERB & SOFFEN, LLP  
1180 Avenue of the Americas  
New York, New York 10036-8403  
Telephone: (212) 382-0700